# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Rinne Corp,

Plaintiff,

v.

Case No. 1:23-cv-16232

The Partnerships, and Unincorporated Associations Identified in Schedule A,

Defendants.

Honorable Judge Jeffrey I. Cummings

#### **DECLARATION OF SIWEI HUANG**

- I, Siwei Huang, declare as follows:
- 1. I am an employee of Suzhou Chenghe Network Technology Co., Ltd. (**Chenghe**), which operates the internet store, goblinpocket.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store's operation and sales and have access to Chenghe's business records.
- 2. I make this declaration based on my personal knowledge and after reviewing Chenghe's business records. If called as a witness, I can competently testify to the matters stated herein.
- 3. Chenghe is incorporated and has its principal place of business in China. Chenghe operates the Store exclusively in China. Chenghe has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.
- 4. Neither the Store nor Chenghe has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.

- 5. Rinne Corp (the **Plaintiff**) alleges the Store has infringed on its copyrights and trademarks. Specifically, Plaintiff's counsel has provided the attached **Exhibit A**, which shows the allegedly infringing products (collectively, **Alleged Products**).
- 6. After reviewing the complaint and Exhibit A provided by counsel, I conducted a diligent search of the Store's sales records for the Alleged Products. **Exhibit B** contains complete and accurate sales records, maintained in the ordinary course of Chenghe's business.
  - 7. Exhibit B shows that the Store has made no sale of the Alleged Products in the U.S.
- 8. There are many similar mousetrap products for sale online. A brief search reveals numerous similar pictures and sales links for such products. Many listings use product descriptions of "flip and slide." *See* Exhibit C.
- 9. Before this litigation, the Store was not aware, nor had any reason to be aware, that it could be infringing any copyrights or trademarks. The Store has not attempted to market or pass off its products as those of the Plaintiff or any other party.
  - 10. The Store has not received summons of this lawsuit at its email address.
- 11. The Store has three Paypal accounts for the Alleged Products, chenghesheep@outlook.com, chenghesite@126.com, and chenghe8827@126.com, with a total frozen amount of \$1,981,660 due to the asset restraints imposed by this litigation.
- 12. The Store still plans to continue business operations. However, the existing restraints significantly hinder the Store's liquidity and ability to maintain normal operations.
- 13. Upon notice of the current litigation (not through service of summons), Chenghe has permanently removed the listings of the Alleged Products. While Chenghe is moving to challenge the Preliminary Injunction Order (Dkt. 41), Chenghe assures the court it will not relist the Alleged Products for sale until further ordered by the court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

[The remainder of this page is intentionally left blank.]

Executed on this 27th day of May, 2024, in Suzhou, Jiangsu, China.

Dated: May 27, 2024

Siwei Huang

# **EXHIBIT A**







Smart Flip N Slide Bucket Lid Mo × +

goblinpocket.com/products/smart-flip-n-slide-bucket-lid-mouse-trap







Q A 🛱

Contact us

All Collections



# Smart Flip N Slide Bucket Lid Mouse Trap

\$29.99 \$59.98 Save 50%

5.7K Month Sold

⚠ It's been recommended by 176 people on Facebook, Twitter and Instagram

865 people are viewing this right now

4 interest-free payments. Available for orders above \$35. Learn More

### Quantity

6 (\$20 OFF) 2 PIECES

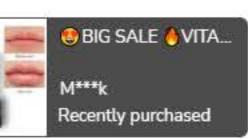
(BUY 2 GET 1 FREE) 3 PIECES

#### Quantity

• 67 visitors currently looking at this product

ADD TO CART





Smart Flip N Slide Bucket Lid Mo × +

Contact us

All Collections

# What's Included



# Smart Flip N Slide Bucket Lid Mouse Trap

\$29.99 \$59.98 Save 50%

- 5.7K Month Sold
- ⚠ It's been recommended by 176 people on Facebook, Twitter and Instagram
- 865 people are viewing this right now

4 interest-free payments. Available for orders above \$35. Learn More

### Quantity

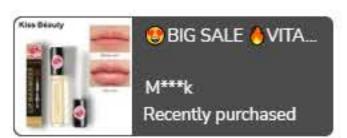
6 (\$20 OFF) 2 PIECES (BUY 2 GET 1 FREE) 3 PIECES

#### Quantity

• 67 visitors currently looking at this product









Smart Flip N Slide Bucket Lid Mo 🗶

# a goblinpocket.com/products/smart-flip-n-slide-bucket-lid-mouse-trap

# What's Included















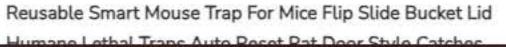
#### WHY OUR MOUSE TRAP BUCKET LID OVER CONVENTIONAL TRAPS?

- Mathematical Resets and holds upwards of 30 mice and 10+ medium-sized Rats; unlike conventional traps which only catch 1 or 2
- Sanitary And No Mess No more having to dispose of dirty corpses from a glue or snap trap, which can potentially infect you with a deadly disease. Now simply release/dispose of the mice/rats without getting close to the
- Programme Reusable The Smart Flip n Slide Bucket Lid Mouse Trap is not a one-and-done throwaway product. You can use our trap repeatedly without having to toss it out.
- . DO Pet/ Children Friendly Stop purchasing traditional Mouse/Rat traps which can harm your family pet or even worse... your children. Our Mouse/Rat trap is 100% safe and nontoxic.

#### HOW DOES IT WORK?

Turn an ordinary 5-gallon bucket into the best trap on the market. No more dealing with 1-time use traps that are often ineffective and unsanitary. With our new Smart Flip n Slide Bucket Lid Mouse Trap, all you have to do is snap it onto a standard-sized 5-gallon bucket and boom you're catching mice and rats.







■ goblinpocket.com/checkouts/bd5ef5a2db3d495d8b8972615c497755?step=shipping\_method

goblinpocket\*UK









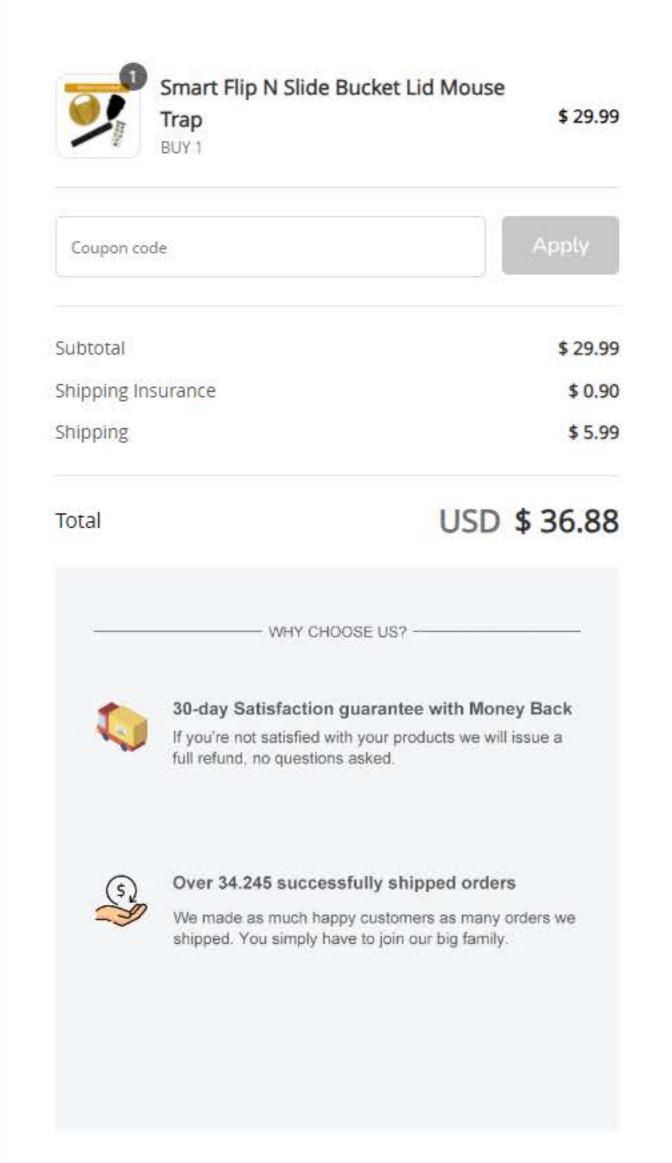




# goblinpocket

Cart > Information > Shipping > Payment

Contact	johndoe789@gmail.com	Change	
Ship to	73 E Lake St. Chicago, 60601 Illinois United States (US)	Change	
hipping m	nethod		
<ul> <li>Standard Shipping</li> </ul>		\$ 5.99	
Expite	d Shipping	\$ 8.99	
Add Sh	ipping Insurance to your order \$ 0.90 🕜		
Return to in	formation Continue	Continue to payment	

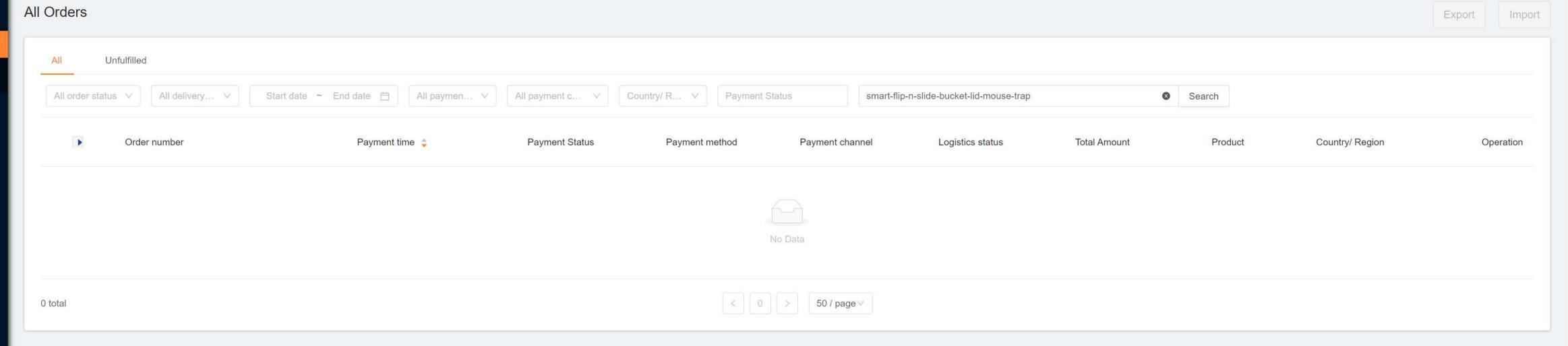


# EXHIBIT B

# ☐ Order

All Orders

Abandoned Order



# **EXHIBIT C**

Memorial Day: up

Medical Care - Groceries -

amazon

Amazon Home

Shop by Room

Garden & Outdoor

Hello, sign in
Account & Lists •

Discover

Shop by Style

Home Décor

Furniture

Best Sellers Amazon Basics New Releases Prime Music Customer Service Today's Deals Amazon Home Registry Books Pharmacy Gift Cards Luxury Stores Smart Home Fashion Sell Toys & Games Find a Gift Automotive Computers Coupons

Kitchen & Dining

Bed & Bath

& Orders

Kat Sense: Your Department of Defense

KAT SENSE

**★★★☆** 6,882 \$17<sup>96</sup> \$19.96 √prime



#### Customers who viewed this item also viewed



Pack 2 Bucket Lid Mouse Trap, 5 Gallon Bucket Compatible, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor (Wine)

★★★☆☆ 49



Pack 3 Bucket Lid Mouse Rat Trap, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor, 5 Gallon Bucket Compatible

★★★☆☆ 7

\$2399 (\$8.00/Count)



Arber Traps Bucket Lid Mouse Trap, Fits on 5 Gallon + 12 Pcs Sticky Mouse Traps Glue + 6 Pcs Spring Snap Traps for Mice - Multi Catch Human... ★★★☆☆ 38

Patio, Lawn & Garden > Pest Control > Traps



Roll over image to zoom in

















2 Pack Mice Mouse Trap Bucket Flip Lid, Bucket Lid Mouse Rat Trap Indoor Outdoor, Humane Mouse Trap, Mouse Catching Tool Auto Reset, 5 Gallon Bucket Compatible (Without Barrel)

Brand: KUWSEIY

3.1 ★★★☆☆ × 24 ratings

100+ bought in past month

\$1299 (\$6.50 / Count)

Get Fast, Free Shipping with Amazon Prime FREE Returns Y

Get \$10 off instantly: Pay \$2.99 \$12.99 upon approval for the Amazon Store Card. No annual fee.

KUWSEIY 2 Pack Color Modern Style Material Plastic

Product 12.17"L x 12.17"W x 2.99"H

**Dimensions** Number of Pieces 1

✓ See more

#### About this item

- [Bucket Mouse Trap] Automatically resets and holds upwards of 10 mice and 5+ medium-sized Rats. Unlike conventional mouse trap bucket lid which only catches 1 or 2. The test concluded that the multi-catch traps by almost 4x. [5 Gallon Bucket is NOT included]
- [Pet/Children Friendly] Stop purchasing traditional mouse trap which can harm your family pet or even worse harm your children. Our humane mouse trap is 100% safe, please feel free to use it.
- [Easy To Use] Only snap it onto a standard-sized 5 gallon bucket mouse trap and boom your catching mice and rats. Now simple release of the mice far away from your house.

prime

Enjoy fast, free delivery, exclusive deals, and awardwinning movies & TV shows with Prime

Try Prime and start saving today with fast, free delivery



Ships from

Sold by

Amazon

Payment Secure transaction

Add a nift receipt for each

KUWSEIY

Eligible for Return, Refund or Replacement

within 30 days of receipt

© Update location amazon

Shop by Room

Amazon Home

Garden & Outdoor - Search Amazon

Discover

EN.

Garden & Outdoor

Hello, sign in
Account & Lists -Returns & Orders

**Celebrate National Small Busin** 

Raid Essentials Flying Insect Light Trap Refills, 2 Light Trap Refill... ★★★★☆ 2,243

= All Medical Care - Groceries - Best Sellers Amazon Basics New Releases Prime - Music Customer Service Today's Deals Amazon Home Registry Books Pharmacy Gift Cards - Luxury Stores Smart Home Fashion Sell Toys & Games Find a Gift Automotive Computers

Home Décor

Save 5% more with Subscribe & Save

Kitchen & Dining

Shop now

Bed & Bath

Patio, Lawn & Garden > Pest Control > Traps



Shop by Style

Roll over image to zoom in











Mouse Trap, Flip and Slide Bucket Lid Mice Rat Trap, for Indoor Outdoor Multi Catch Auto Reset (Size : Black)

Brand: SnOwky

\$3689

Get \$10 off instantly: Pay \$26.89 \$36.89 upon approval for the Amazon Store Card. No annual fee.

#### Size: Black

Black Yellow White \$36.89 \$36.89 \$36.89 \$36.89

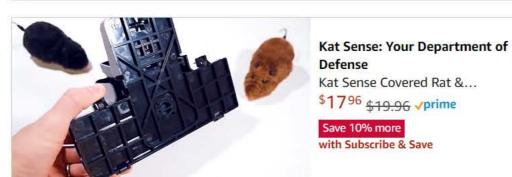
**Furniture** 

Brand SnOwky Color One Color 516 Grams **Item Weight** Number of Pieces 1

#### About this item

- [Special Designed] This trap was designed with the intent to be used in a catch and release style, but it is optionable to fill the bucket up with water to
- [Cleaner than ever] No more need to discard dirty mice with glue or traps, which can infect them with a deadly disease. Now, just release/dispose of the mouse without having to go anywhere near the mess.
- [Easy to use] All you have to do is clip it into a standard size 5-gallon bucket and use it to catch rats and mice. No longer handle single-use traps, which are often ineffective and unhygienic.
- [Family Friendly] Stop purchasing traditional mouse traps which can harm your family pet or even worse... your children. Our mouse trap is 100% safe .
- [Reasonable use] We can spread peanut butter in the tunnel of the mousetrap, and the mouse will follow the smell into the tunnel, and fall back into the bucket without getting the peanut butter.

Report an issue with this product or seller







**HECO ARMOR** 

**Hanging Wasps** 

Outdoor

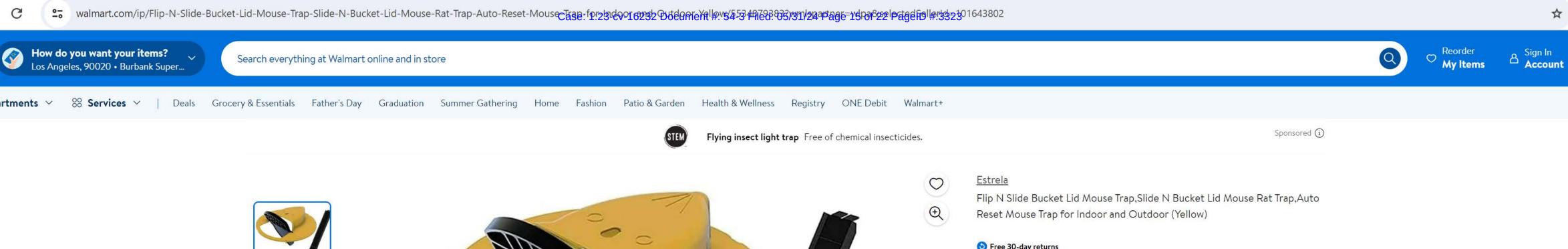
Traps

HECO ARMOR Wasp Traps, Outdoo...

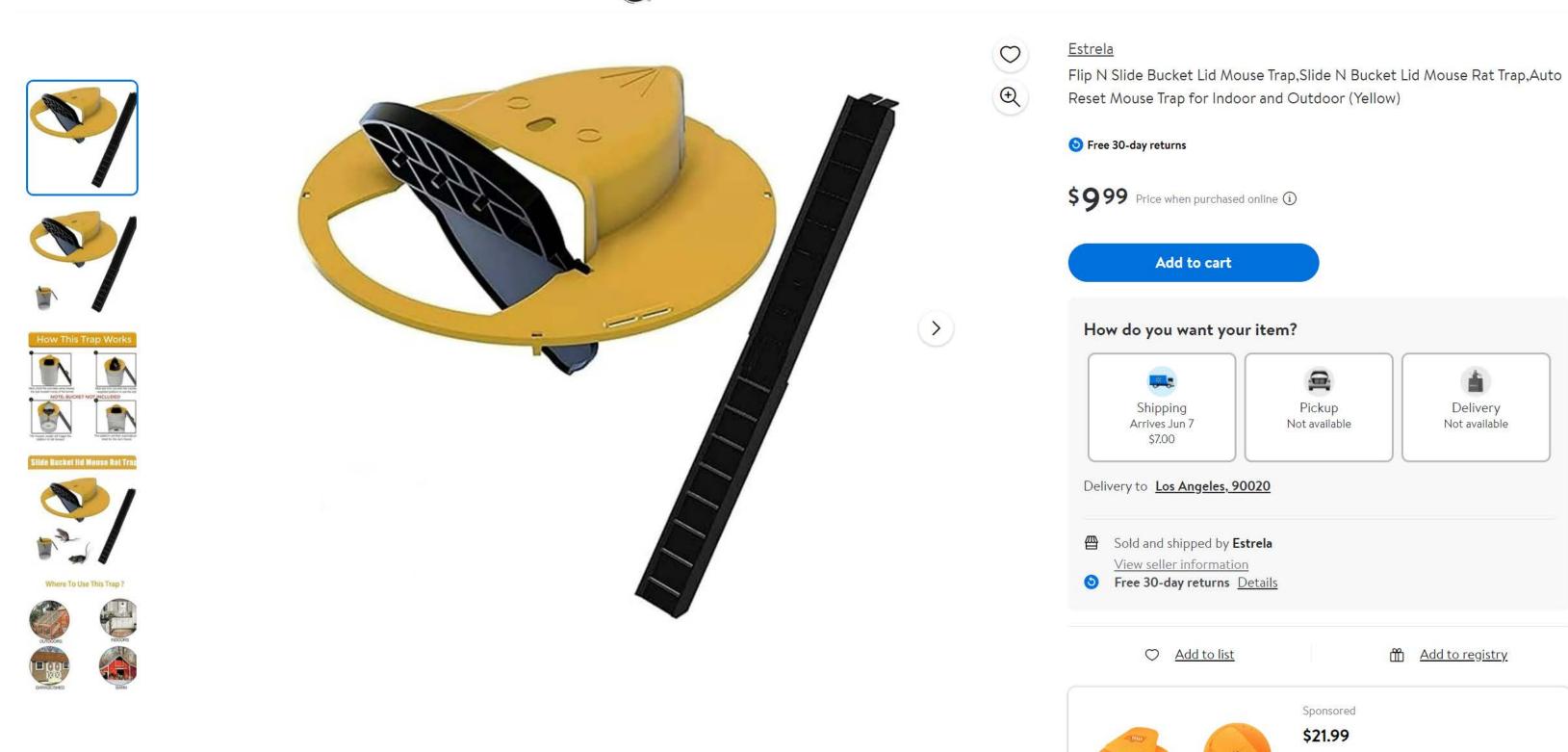
★★★☆☆ 69

20% off Limited time deal

\$23<sup>99</sup> \$29.99 \rime









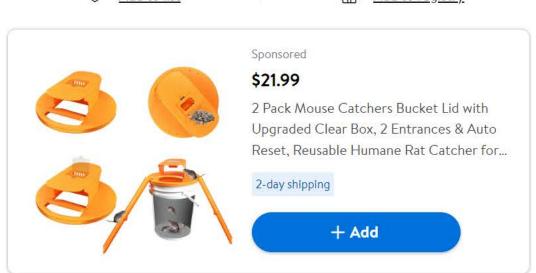
Best selling items that customers love

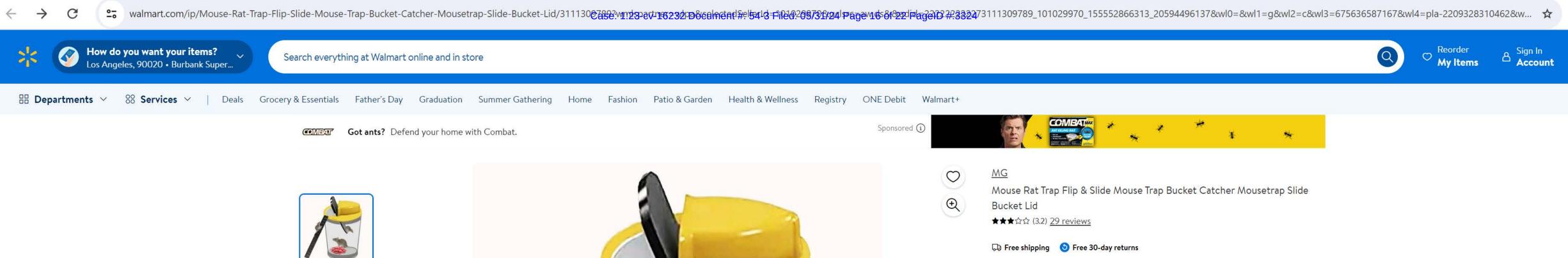












Package does NOT include Bucket

(Trap Lid fits 5 Gallon Bucket)

Q rinnetraps - flip n slide bucket lid mouse trap

Q bucket mouse trap 5 gallon

Continue your search on Walmart

Similar items you might like

Q bucket mouse trap

Q flip and slide mouse trap

Based on what customers bought

Q onebit rat bar poison

Q mouse trap flip bucket top

Reduced price

>

Q rat trap bucket

0

Q mouse tramp

\$995 Price when purchased online (i)

Add to cart

How do you want your item?

Shipping

Arrives May 31

Free

Delivery to Los Angeles, 90020

★★★☆ 103 seller reviews

View seller information

Free 30-day returns Details

Add to list

1

Pickup

Not available

Sponsored

\$37.71

★★★★☆ 134

2-day shipping

Sold and shipped by Alltech Devices, LLC | Pro Seller (1)

Delivery

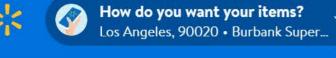
Not available

Add to registry

Oxgord Live Animal Trap Humane Catch &

Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large )...

+ Add



Search everything at Walmart online and in store

Bepartments Wellness Registry ONE Debit Walmart+

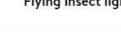
<

Flying insect light trap Free of chemical insecticides.

















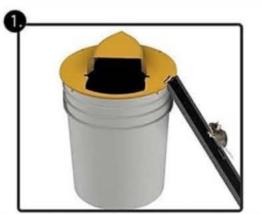








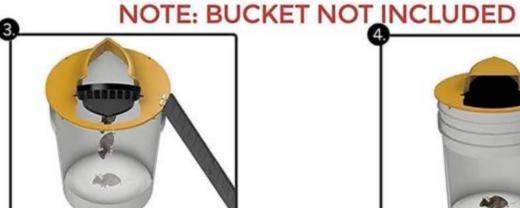




Mice climb the provided ramp toward the bait located inside of the tunnel



Mice will inch out onto the counter weighted platform to eat the bait



The mouses weight will trigger the platform to fall forward



The platform will then automatically reset for the next mouse

Flip N Slide Bucket Lid Mouse Trap, Slide N Bucket Lid Mouse Rat Trap, Auto Reset Mouse Trap for Indoor and Outdoor (Yellow)

Tree 30-day returns

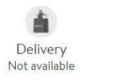
\$999 Price when purchased online (i)

#### Add to cart

### How do you want your item?







Sponsored (i)

Delivery to Los Angeles, 90020

- Sold and shipped by Estrela View seller information Free 30-day returns Details
  - Add to list

#### Add to registry

#### Sponsored \$21.99

2 Pack Mouse Catchers Bucket Lid with Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...

2-day shipping

+ Add

## Popular items in this category

Best selling items that customers love









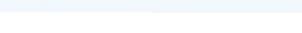
☆

Search everything at Walmart online and in store



C Reorder
My Items





□ Departments ∨ 8 Services ∨ Deals Grocery & Essentials Father's Day Graduation Summer Gathering Home Fashion Patio & Garden Health & Wellness Registry ONE Debit Walmart+

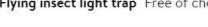
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0























Q rat trap bucket

#### <u>Aegis</u>

2x Mice Trap Reusable Smart Flip and Slide Bucket Lid Mouse Rat trap Auto

★★☆☆ (2.9) 7 reviews

\$1999 Price when purchased online (i)

#### Add to cart









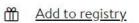
Sponsored (i)

Delivery to Los Angeles, 90020

Sold and shipped by Aegis Inc

★★★★ 84 seller reviews View seller information Free 30-day returns <u>Details</u>

### Add to list





### \$11.99

HYEASTR Mouse Trap Bucket Flip Lid Mouse Rat Trap Bucket Lid Auto Reset Multi Catch Humane Rat Trap for Indoor...

3+ day shipping

+ Add

#### Continue your search on Walmart

Q rinnetraps - flip n slide bucket lid mouse trap Q auto reset barrow mouse and rat

Q rat trap bucket lids

Q rodent traps

Q mouse trap that goes on a bucket

## Similar items you might like

Based on what customers bought







Q rat traps



Search everything at Walmart online and in store





A Sign In Account

□ Departments ∨ 88 Services ∨ Deals Grocery & Essentials Father's Day Graduation Summer Gathering Home Fashion Patio & Garden Health & Wellness Registry ONE Debit Walmart+

Prevent bug bites Protection for every day.

Sponsored (i)





#### **HYEASTR**

0

HYEASTR Mouse Trap Bucket Lid (2 Pack) - Humane Flip and Slide Bucket Lid Mouse/Mice/Rat Trap, Auto Reset, Multi Catch Mice Trap Compatible with 5 Gallon Bucket for Indoor/Outdoor/Chicken Coop

★公公公公 (1.0) 1 review

\$1679 Price when purchased online (i)

#### Add to cart

### How you'll get this item:







Add to registry

Los Angeles, 90020 Change

Arrives by Thu, May 30 | More options

Sold and shipped by HYEASTR STORE

★★★☆☆ 3 seller reviews View seller information

Free 30-day returns <u>Details</u>

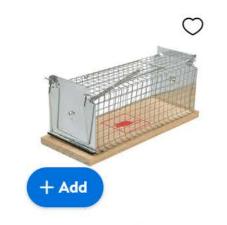
Add to list

## Similar items you might like

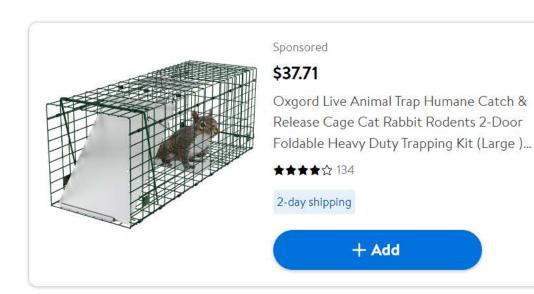
Based on what customers bought











Search everything at Walmart online and in store

Bepartments > 8 Services > | Deals Grocery & Essentials Father's Day Graduation Summer Gathering Home Fashion Patio & Garden Health & Wellness Registry ONE Debit Walmart+

Feels good on the skin Worry free protection.

Sponsored (i)











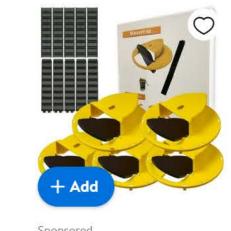


## Similar items you might like

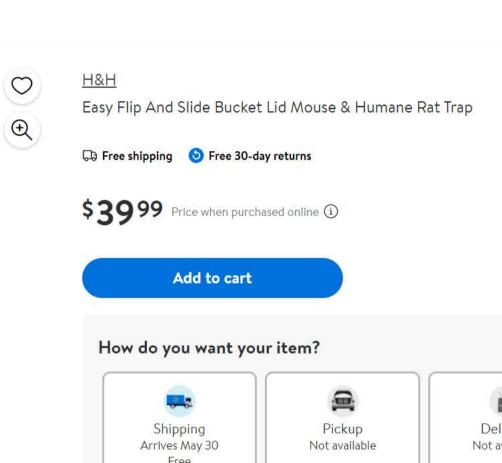
Based on what customers bought

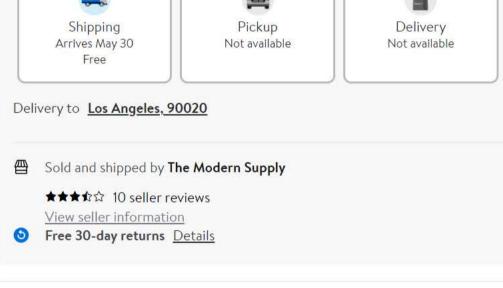


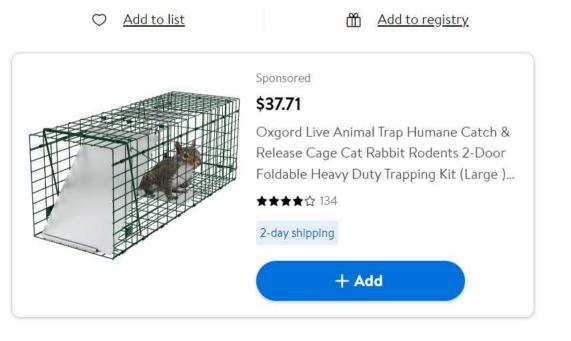


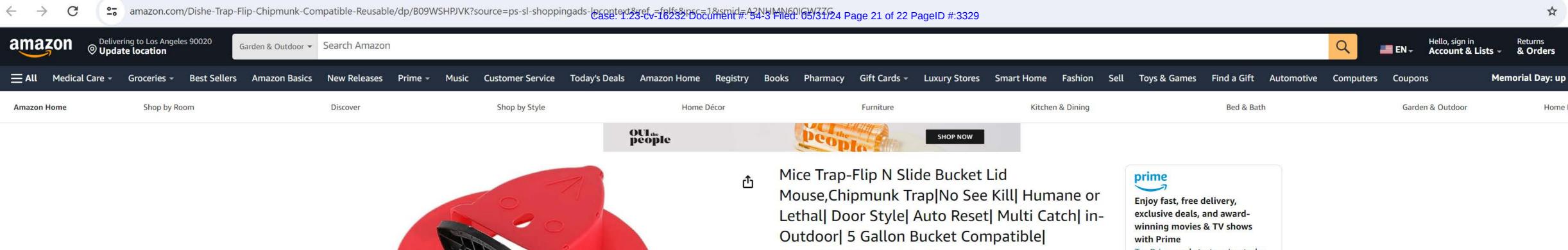


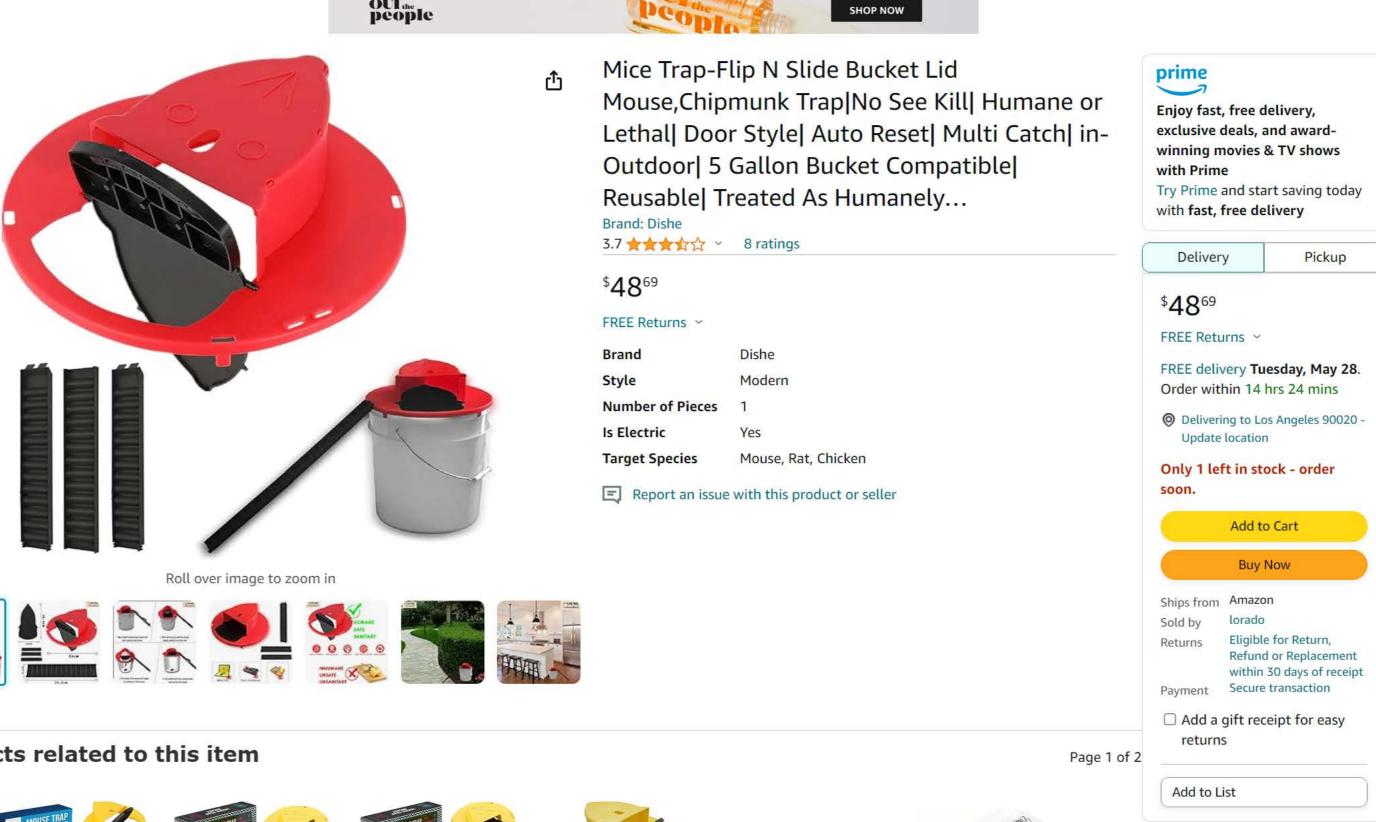












### Products related to this item



Multi-Catch Mouse Traps Outdoor - Humane or Lethal Squirrel Traps - 5 Gallon Bucket... 3.0 ★★★☆☆ 85 \$4999

√prime



Gallon Bucket Lid Mouse Rat Trap 3 Pack -Automatic Reset Flip... 3.6 ★★★☆☆ 2,554 \$23<sup>88</sup> (\$7.96/Count) **√**prime



Gallon Bucket Lid Mouse Rat Trap 4 Pack -Automatic Reset Flip... \$28<sup>88</sup> (\$7.22/Count) √prime



Bucket Lid, Bucket Lid, Trapdoor Style, Indoor and Outdoor, Reusa... 3.2 ★★★☆☆ 417 \$12<sup>98</sup>

√prime



LockNLube Grease Gun Coupler locks onto Zerk fittings. Grease goes in, not on the m... 4.7

#1 Best Seller \$3299

√prime

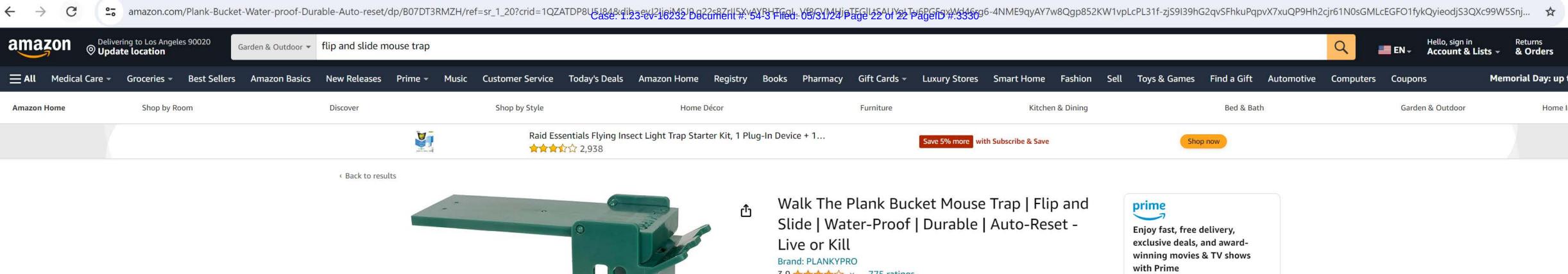


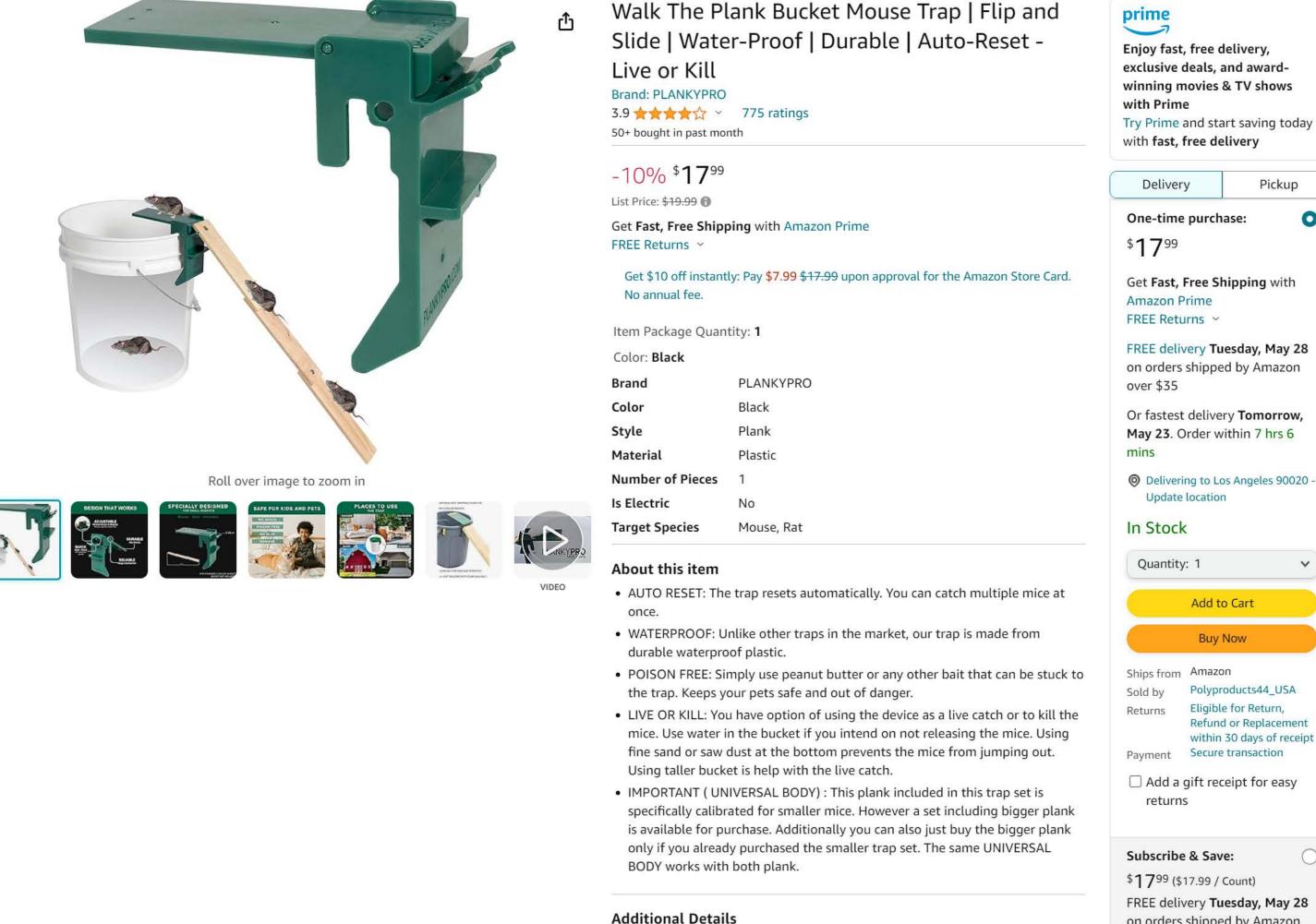
200PCS Barrel Snap Swivel Fishing Accessories, Premium Fishing Gear... 4.6

\$999



√prime





0

on orders shipped by Amazon

over \$35